
**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANNETTE WRIGHT,)
vs. Plaintiff,) No: 15 CV 4837
vs.) Jury Demand
PARTY CITY OF HOFFMAN ESTATES,)
Defendant.)

**COMPLAINT
AS AND FOR A FIRST CAUSE OF ACTION
(TITLE VII SEXUAL DISCRIMINATION-HOSTILE ENVIRONMENT)**

1. Plaintiff, **ANNETTE WRIGHT** ("WRIGHT"), a former employee of **PARTY CITY OF HOFFMAN ESTATES**, ("PARTY CITY"), seeks redress for sex discrimination and a hostile environment by the Defendant through its agents, in violation of her rights under the Civil Rights Act Title VII.
2. This is an action under Title VII of the Civil Rights Act of 1964 and as amended by inter alia, the Civil Rights Act of 1991, 42 U.S.C. 2000(e) *et seg.*, for the Defendant, PARTY CITY having subjected WRIGHT to sex discrimination by failure to treat her the same as male employees and subjecting her to a hostile environment based upon her sex despite WRIGHT'S repeated complaints about same.
3. Jurisdiction of this court is provided by 28 U.S.C. 1331 and 1343.

PARTIES

4. WRIGHT, is a female and an adult person and a resident of Cook County, State of Illinois.

5. PARTY CITY is an employer within the meaning of the Civil Rights Act and 42 U.S.C. 2000(e) *et seq.*, and has been at all times material to the allegations herein.

6. WRIGHT filed a discrimination charge against Defendant with the Equal Employment Opportunity Commission (EEOC). That charge was timely filed, under the Title VII of the Civil Rights Act of 1964, 42 U.S.C. A. § 2000e-5(e). (See Exhibit "A")

7. On March 4, 2015, WRIGHT was sent a notice from the EEOC of her right to bring this action (see Exhibit "B"), and WRIGHT timely filed this action.

STATEMENT OF CLAIMS

8. WRIGHT was an employee of PARTY CITY from October 1, 2007 until WRIGHT was wrongfully terminated after her reports to Human Resources of sex discrimination and a hostile environment in August of 2013.

9. At all times relevant, WRIGHT was meeting the legitimate expectations of PARTY CITY.

10. Beginning in February 11, 2013 through August 7, 2013, her immediate supervisor, wrongfully harassed WRIGHT, her supervisor knowingly treating WRIGHT differently than other employees whom were male, whose performance was the same as or, less than that of WRIGHT.

11. PARTY CITY intentionally subjected WRIGHT to unequal and discriminatory treatment by discriminating and harassing WRIGHT based on her gender.

12. By engaging in discriminatory conduct, PARTY CITY discriminated against WRIGHT in violation of 42 U.S.C. 2000(e) as amended.

13. The discriminatory action of PARTY CITY as set forth above has caused WRIGHT to suffer losses of earnings, and as a further proximate result of PARTY CITY's unlawful

and intentional discriminatory actions against WRIGHT has suffered emotional pain, humiliation, mental anguish, loss of enjoyment of life, and emotional distress. All in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. Section 2000-3 *et seq*; as amended by inter alia the Civil Rights Act of 1991.

14. Further, said action on the part of the PARTY CITY was done with malice and reckless disregard for WRIGHT's protected rights.

**AS AND FOR A SECOND CAUSE OF ACTION
(Title VII-RETALIATION-HOSTILE ENVIRONMENT)**

15. WRIGHT realleges each and every allegation set forth above with the same force and effect as if more fully set forth herein.

16. PARTY CITY has intentionally retaliated against Plaintiff, based upon filing her complaints of sex discrimination and a hostile work environment with her supervisor.

17. Thereafter, PARTY CITY's agents created a hostile, retaliatory and offensive work, hostile and retaliatory environment by treating her differently than other employees not complaining of sex discrimination and/or hostile work environment, all in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. Section 2000-e *et seq*, as amended by, inter alia the Civil Rights Act of 1991.

18. By reason of this retaliation by PARTY CITY, Plaintiff did suffer a loss of earnings and benefits, in addition to suffering great pain, humiliation and mental anguish, all to her damage.

19. Further, said action on the part of the PARTY CITY was done with malice and reckless disregard for Plaintiffs' protected rights.

PRAYER FOR RELIEF

WHEREFORE, WRIGHT prays for judgment as follows:

1. Declare the conduct engaged in by PARTY CITY to be in violation of WRIGHT's rights;
2. For injunctive relief, including but not limited to reinstatement and relief required to make WRIGHT whole for the losses and protect her from further violation caused by the violations of PARTY CITY;
3. For compensatory damages in an amount according to proof;
4. For punitive damages based upon the wrongful conduct of PARTY CITY
5. For costs of suit, including reasonable attorney's fees and expert fees, pursuant to 42 U.S.C.A § 12117(a), which incorporates the remedies set forth in Title VII of the Civil Rights Act of 1964, Title 42 U.S.C.A. § 2000e-5(k); and
6. For such other and further relief as the court deems proper.

ANNETTE. WRIGHT

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